



HERALD BROADCASTING

Route 2, Box 107A
Pineland, SC, U.S.A.
29934

(803) 625-5551
Fax (803) 625-5559

An International Shortwave Network

RECEIVED

JAN 20 1995

FCC MAIL ROOM

January 17, 1995

Office of the Secretary
1919 M St, NW
Federal Communications Commission
Washington, D.C. 20554

Re: Notice of Inquiry

DOCKET FILE COPY ORIGINAL

MM Docket No. 94-130

Unattended Operation of FCC-licensed Stations

Dear Sir/Madam Secretary:

In General Docket No. 94-130, the FCC requested comments regarding whether and under what circumstances the FCC should waive the requirement that a broadcast station must have a licensed radio operator on duty in charge of the transmitter during all periods of broadcast operation. Our comments on the referenced Docket are hereby submitted with an original and nine copies.

Qualifications of Respondent

I, C. Ed Evans, am Senior Station Manager for the three FCC-licensed International Broadcast Stations owned and operated by The Herald Broadcasting Syndicate, a wholly owned subsidiary of The First Church of Christ, Scientist, in Boston, Massachusetts. The First Church of Christ, Scientist, also owns The Christian Science Publishing Society, which publishes the Pulitzer Award-winning newspaper, THE CHRISTIAN SCIENCE MONITOR. The three stations - WCSN, Scotts Corners, Maine; WSHB, Cypress Creek,

No. of Copies rec'd 029
List A B C D E

South Carolina; and KHBI, Saipan, CNMI - collectively operate three 500-kilowatt transmitters, two 100-kilowatt transmitters, and 10 high-gain curtain antennas for international broadcasting. WCSN, in Maine, has been in operation since 1987; and WSHB and KHBI have been in operation since 1989. I have served as Senior Station Manager since 1989. I hold a Bachelor of Engineering Degree in Electrical Engineering from Clemson University, and prior to my position at Herald Broadcasting, I served as Manager of Operations and Engineering at Palmetto Electric Cooperative. I have 22 years of work experience in the electrical and broadcast fields.

Comments On The Waiver As It May Affect

International Broadcast Stations - NOI Paragraph 14

The Herald Broadcasting Syndicate - HBS - has operated high power transmitters and antennas for the past eight years. We have experienced several types of transmitter failures and operational shutdowns in that period of time. While none have been of a catastrophic nature, in one instance there was a situation that may have escalated into an emergency situation, had not station been manned. HOWEVER, the situation was not such that a "licensed operator" was needed to respond; a responsible security employee was all that was necessary to control the situation.

HBS has studied and evaluated the use of SCADA - Supervisory Control and Data Acquisition - systems currently in use by international broadcasters in Switzerland and Finland. In both instances, these systems are unattended stand-alone systems operating 500-kilowatt

transmitters and high-gain curtain antennas. These systems have a long record of reliability and safety in both installations. While they are operating in "unattended mode," in both instances these broadcast stations do have on premises or nearby responsible station personnel that can respond quickly and efficiently in an emergency.

HBS believes that the current level of sophistication of SCADA-type systems makes it unnecessary for "licensed" operators to be manning the station equipment. These systems are fully capable of tuning, modulating, and powering a transmitter/antenna system properly and within specifications. Furthermore, these systems can be monitored and controlled remotely, so that a knowledgeable or "licensed" Operator can make necessary adjustments from outside of the broadcast center, in a safe, efficient, and prudent manner, and within a reasonable amount of time.

From a safety standpoint, HBS feels that it may be prudent to "man" the station with a "qualified security" employee to guard against an emergency condition such as a fire or burst piping, but not to oversee the operation of the transmitting equipment itself; however, if such personnel is nearby and can be summoned by a remote Operator, then this need may be lessened sufficiently to allow fully remote operation of the station.

Respectfully Submitted,



C. Ed Evans
Senior Station Manager
The Herald Broadcasting Syndicate